

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**IN RE:**

**Chapter 11**

**YELLOW CORPORATION, et al.,<sup>1</sup>**

**Case No. 23-11069 (CTG)  
(Jointly Administered)**

**Debtors.**

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**NOTICE OF INTENT TO PERFECT STATUTORY LIENS  
BY DOING STEEL FABRICATION, LLC PURSUANT TO  
11 U.S.C. § 546(B)(2) AND APPLICABLE NON-BANKRUPTCY LAW**

Doing Steel Fabrication, LLC (“Doing Steel”) hereby gives notice pursuant to 11 U.S.C. § 546(b)(2) of its intent to perfect its interest in certain property of the estate, and in the proceeds, products, offspring, rents, or profits of such property.

1. Doing Steel hereby gives notice of its intent to perfect, maintain and continue the perfection of interests of the type described in 11 U.S.C. § 546(b)(1) (the “Section 546 Interests”) in property of the estate, in property of the Debtors, or in property of third parties who are in privity with the Debtors. The Section 546 Interests perfected or maintained or continued herein extend in and to the oil and gas leases and wells, their proceeds, products, offspring, rents, or profits for such property. The property in which Doing Steel hereby gives notice of its intent to perfect, maintain, or continue the perfection of its Section 546 Interests is described in the attached Notice of Intent to File Mechanic’s Lien Claim (attached as Exhibit 1 to this Notice and incorporated herein by reference).

2. Doing Steel asserts a security interest as set forth above in the property identified

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

above to the full extent allowed by law, including interest and attorneys' fees.

3. Once this notice is provided, Doing Steel may proceed to serve the notice described in Exhibit 1 to this notice on the owner of the subject property and file a mechanic's lien on the subject property without further notice to this Court. In addition, this notice constitutes legal notice that, upon the serving of the notice and filing of the mechanic's lien, Doing Steel will have taken all steps necessary to perfect its interest in the subject property, and then having commenced a suit to foreclose the liens in the proper court. Accordingly, by reason of this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce Doing Steel's mechanic's lien was not timely commenced pursuant to applicable state law. Doing Steel intends to enforce its lien rights to the fullest extent permitted by applicable law.

4. Doing Steel reserves the right to supplement and/or amend this notice, including the amounts owed and to include the costs incurred. Doing Steel retains its right to seek relief from the automatic stay, to foreclose its liens against the Section 546 Interests, and to pursue all other rights and remedies it may have.

*[Signature Page to Follow]*

Dated: October 13, 2023

Respectfully submitted,

**GELLERT SCALI BUSENKELL & BROWN, LLC**

/s/ Ronald S. Gellert

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